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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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<http://www.epa.gov/region08>

SEP 23 1999

Ref: 8EPR-F

Edd Kray  
CDPHE 776/777 Project Coordinator  
4300 Cherry Creek Dr. S.  
Denver, CO 80246-1530

SUBJECT: BUILDING 776/777 CLOSURE PROJECT DECOMMISSIONING  
OPERATIONS PLAN

Dear Mr. Kray:

EPA has reviewed the Building 776/777 Closure Project Decommissioning Operations Plan (Revision 0, July 7, 1999). As part of our review we asked Richard Graham, of EPA, to assist in the review and comment.

The only item that is non-negotiable would be the buried waste in and under the building. This characterization and remove must be done during the decommissioning process.

Below are a compilation of our comments.

If you have any questions, please feel free to call me at (303) 312-6251 or Richard Graham at (303) 312-7080.

Sincerely,

  
Mark Aguilar  
Remedial Project Manager

cc: Tim Rehder, EPA  
Steve Gunderson, CDPHE  
Dorothy Newell, DOE  
Sandy MacLeod, DOE  
Randy Walker, K-H



CCDH

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## GENERAL COMMENTS

1. Assuming the 2006 Plan becomes a reality, how will we modify the DOP? Major or Minor Modification?
2. There is a concern that all the buildings within the cluster are not being address in the DOP. However, another concern is that building 712a and 713a are not listed in the Facility Disposition Program Manual. This needs to be addressed.
3. The DOP has made reference to buried wasted and waste that has been cemented over. All these areas must be removed before demolition. This is not in referenced to under building contamination.
4. The table for surface contamination guidelines is missing a unit in footnote 3 and 6.

## SPECIFIC COMMENTS

1. Section 2.3, page 19. There are large quantities of waste containers in the building, yet there is no indiction of where these containers will go. Could you provide the current plan for removal of these containers. Decisions?
2. Section 4.1, page 23. It sounds like one team could mobilized and demobilize in one room 3 or 4 times before it is completely dispositioned. What happen to the "TOUCH THINGS ONCE" that is being used in building 771. This method sounds slow and costly.
3. Section 4.3.2.1, page 26. Regarding the buried waste in and under building 776/777. First, any contaminant that poses a threat to human health and the environment falls under the CERCLA statute and requires a Sampling and Analysis Plan. Second, all buried waste must be addressed during decommissioning. Finally, the DOP should decribe how and when these investigation will take place. These investigation should be outlined in the schedule as well as the actual D & D work and removal of these wastes. How will these investigation be done? When in the process will this waste be addressed.
4. Section 4.3.3.1, page 29. It states that in-process characterization is based on process knowledge. This is an incorrect statement. In-process characterization is based on field samples and radiation surveys measurements that are take during the decommissioning process. Please rewrite.
5. Section 4.3.3.5, page 32. Sampling should be done to confirm that radiation is not mixed with any asbestos containing material. What about the insulation in the walls?
6. Section 4.11.6, page 47. How are you addressing the Health and Safety concerns for air borne Pu?
7. Section 4.12, page 47. In this section it discussed 4 Zone II plenum deluge tanks. Why

aren't we removing all 4 of them? What are the contaminants and what are the concentration?

8. Section 5.2, page 65. Will there be neutron detectors used during D & D? (ie. neutron badges)
9. Section 5.3, page 65. How are you addressing the Health and Safety concerns for air borne Pu?
10. Section 6.2.5, page 75. Leaking ballasts are considered PCB remediation waste. Interesting concept Be not considered hazardous waste. I did know that a known carcinogen is not considered hazardous. This state should be rewritten. In addition, all Be house keeping standards need to be explained and used.
11. Section 6.2.7, page 76. Again. Be not considered hazardous waste. To my knowledge we have not agreed to allow Be to be disposed of in a sanitary landfill. This needs further discussion.
12. Table 14, page 77. How are you addressing pyrophoric concerns surrounding Pu and Uranium?
13. Section 7.0, page 85. The ARARs Section needs further discussion regarding authority.